

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

MAR 12 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY PM

JENAMÉ ARELLANÉZ
Plaintiff.

v.
OFFICER RAUL MORALES
Defendant,

CAUSE NO. EP-19-CV-00187-PM

PLAINTIFF JENAMÉ ARELLANÉZ'S
RESPONSE TO DEFENDANT OFFICER RAUL
MORALES'S REQUESTS FOR PRODUCTION

1. DO NOT HAVE COPIES OF ANY STATEMENTS PREVIOUSLY MADE CONCERNING THE SUBJECT MATTER OF THIS LAWSUIT IN MY POSSESSION CUSTODY OR CONTROL.
2. I AM NOT ABLE TO PRODUCE A COPY OF MY DRIVERS LICENSE.
3. I HAVE NO COPIES OF ANY WRITTEN OPINIONS BY EXPERT WITNES.
4. COPY IS ENCLOSED
5. MEDICAL RECORDS RELEASE ENCLOSED
6. COPY OF AUTHORIZATION ENCLOSED
7. IRRELEVANT
8. I HAVE NO ACCESS TO PAST W-2 FORMS
9. I HAVE NO ACCESS TO PHOTOGRAPHS BEFORE OR AFTER
10. I DO NOT HAVE COPIES TO ANY MEDICAL BILLS
11. I HAVE NO DOCUMENTS SHOWING MY EMOTIONAL STATUS AS A RESULT OF THE INCIDENT.
12. SEE ATTACHED SHEET
13. MEDICAL STAFF AT EL PASO COUNTY JAIL & EL PASO COUNTY JAIL ANNEX, DCL-SOL MEDICAL CENTER STAFF ON JOE BATTLE ON OCT 12, 2017 WHEN EL PASO, TX E.M.S. TOOK PLAINTIFF TO DCL-SOL FOR HEAD TRAUMA. THE OPTOMETRIST AT TEXAS TECH IN EL PASO, TX ON ALI MEDA DR. FOR REFERRALS FROM MEDICAL STAFF AT EL PASO COUNTY JAIL ANNEX FOR RETINA DETACHMENT & SIGHTING.

NERVE DAMAGE AND PERMANENT RIGHT EYE BLINDNESS.

14. I HAVE NO COPIES OF NO STATEMENTS MADE BY ANY EYE WITNESS.
15. I HAVE NO COPIES
16. I HAVE NO RECORDS REGARDING MEDICATION BEING PRESCRIBED
17. PLAINTIFF JEROME ARELLANEZ'S "DISCOVERY VIDEO OF OCTOBER 12, 2017 STILL IN HIS POSSESSION PROVIDED BY JIM DANIELL, P.C. 310 NORTH MESA, SUITE 212 EL PASO, TX 79901. ON JUNE 17, 2020.

(P. 3)

REGARDING # 12 of PLAINTIFF
JULIANA ARILLANIZ'S response to
DEFENDANT OFFICER RAUL MORALES
first request for production.

GROSS \$20 per hour x 40 hrs = \$800

\$800 x 52 weeks = \$41,600

2022 to 2043 = 21 years lost wages
AT \$41,600 per year = \$873,000

Plaintiff JERAME ARZELLANEZ'S
RESPONSE TO DEFENDANT OFFICER RAUL MORALES
AND HIS ATTORNEY JIM DARNELL, P.C.
REQUEST FOR "AUTHORIZATION FOR RELEASE
OF PERSONAL RECORDS".

Plaintiff JERAME ARZELLANEZ IS
BEING DENIED COUNCIL AND DON'T FEEL
COMFORTABLE ANSWERING THESE QUESTIONS
WITHOUT AN ATTORNEY. PLAINTIFF ARZELLANEZ
DOES NOT SEE WHAT HIS WORK HISTORY OR
PREVIOUS INSURANCE RECORDS ETC. HAS TO DO
WITH BEING ASSAULTED BY DEFENDANT OFFICER
RAUL MORALES. VIOLATION OF HIS CIVIL RIGHTS.

Plaintiff JERAME ARZELLANEZ'S
RESPONSE TO DEFENDANT OFFICER RAUL MORALES
AND HIS ATTORNEY JIM DARNELL REQUEST FOR
COPY OF TAX RETURN. PLAINTIFF ARZELLANEZ
FEELS THIS IS IRRELEVANT. FORM 4506
REQUEST FOR COPY OF TAX RETURN.

CERTIFICATE OF SERVICE

I CERTIFY UNDER PENALTY OF PERJURY
THAT I SERVED A TRUE AND CORRECT COPY
OF THE ATTACHED 1st "GOLDEN RULE"
LETTER BY PLACING IT IN THE U.S. MAIL
POSTAGE PRE-PAID AND PROPERLY ADDRESSED
TO;

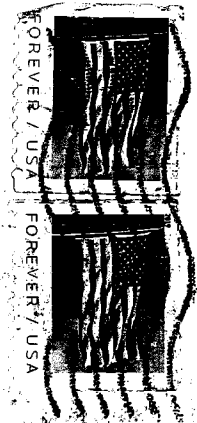
CLERK, U.S. OF THE DISTRICT
WESTERN DISTRICT OF TEXAS
UNITED STATES COURTHOUSE
525 MAGOFFIN AVE. NORMAN, OK
71 PAGO, TX 79901

ON THE 9th DAY OF MARCH
2021

BY J. Arrellan
JERAME LEE ARELLAN
Institutional I.D. no: 2238106
998 County Road A.A.
PLAINVIEW, TX 79072
Plaintiff in Pro-Se

JENKINS & ALLANESZ # 2038106
298 County Road A.A.
Amarillo, TX 79102

AMARILLO TX 791
09 MAR 2021 PM 21

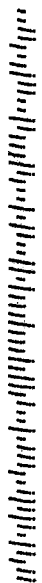


CLERK, U.S. District Court
Western District of Texas
United States Court House
525 Main Street, Room 105
RECEIVED MAR 12 2021 TX 79102

MAR 12 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY PM DEPUTY CLERK

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MAIL